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Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

December 15, 2021
By Ravi Subramanian, Clerk
Samantha Ratz Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES WESLEY BOWDEN,

Defendant.

NO. CR21-219 RSM
INDICTMENT

The Grand Jury charges that:

COUNT 1

(Unlawful Possession of Firearms)

On or about November 4, 2021, in Snohomish County, within the Western District of Washington, JAMES WESLEY BOWDEN, knowing he had been convicted of the following crimes punishable by imprisonment for a term exceeding one year:

Burglary in the First Degree, in Skagit County Superior Court, Washington, under cause number 98-1-00435-1, on or about January 14, 1998, and

Theft of a Firearm, in Skagit County Superior Court, Washington, under cause number 98-1-00435-1, on or about January 14, 1998,

1 did knowingly possess, in and affecting interstate and foreign commerce, the following
2 firearms:

3 DPMS Inc. Model A-15 5.56mm rifle;
4 Savage Model 110 .270 Winchester caliber rifle;
5 Ceska Zbrojovka Model CZ 75 Tactical Sporter Orange .40 S&W caliber pistol;
6 Smith & Wesson Model M&P 15 .458 SOCOM caliber rifle;
7 Colt Model Single Action Army .45 Colt caliber revolver;
8 Colt Model Detective Special .38 Special caliber revolver;
9 Czech Small Arms Model SA VZ61 .32 ACP caliber pistol;
10 Izhevsk Mechanical Plant Model IZH 35 .22LR caliber pistol; and
11 International Die Casting (Jimenez Arms) Model JA 380 .380ACP pistol;

12 all of which had been shipped and transported in interstate and foreign commerce.

13 All in violation of Title 18, United States Code, Section 922(g)(1).

14 **COUNT 2**

15 **(Possession of Machineguns)**

16 On or about November 4, 2021, in Snohomish County, within the Western District
17 of Washington, JAMES WESLEY BOWDEN knowingly possessed the following
18 machineguns: a .308 Winchester caliber machinegun assembled using a receiver from an
19 Imbel FZ Model FZ SA rifle, and a .300 Blackout caliber machinegun manufactured
20 using a receiver of unknown origin.

21 All in violation of Title 18, United States Code, Sections 922(o).

22 **COUNT 3**

23 **(Possession of a Short Barreled Rifle)**

24 On or about November 4, 2021, in Snohomish County, within the Western District
25 of Washington, JAMES WESLEY BOWDEN knowingly possessed a firearm, that is, a
26 9x19mm caliber privately made rifle, having a barrel of less than 16 inches in length,
27 which was not registered to him in the National Firearms Registration and Transfer
28 Record.

1 All in violation of Title 26, United States Code Sections 5861(d) and 5845(a)(3).

2 **COUNT 4**

3 **(Possession of a Destructive Device)**

4 On or about November 4, 2021, in Snohomish County, within the Western District
5 of Washington, JAMES WESLEY BOWDEN knowingly possessed a destructive device,
6 that is, a grenade, which was not registered to him in the National Firearms Registration
7 and Transfer Record.

8 All in violation of Title 26, United States Code, Sections 5861(d) and 5845(a)(8).

9 **COUNT 5**

10 **(Possession of Silencers)**

11 On or about November 4, 2021, in Snohomish County, within the Western District
12 of Washington, JAMES WESLEY BOWDEN knowingly possessed firearm silencers,
13 that is, two black cylindrical silencers with no identifying markings, which were not
14 registered to him in the National Firearms Registration and Transfer Record.

15 All in violation of Title 26, United States Code, Sections 5861(d) and 5845(a)(7).

16 **COUNT 6**

17 **(Improper Storage of Explosives)**

18 On or about November 4, 2021, in Snohomish County, within the Western District
19 of Washington, JAMES WESLEY BOWDEN knowingly stored high explosives in a
20 manner not in conformity with regulations promulgated by the Attorney General pursuant
21 to Title 18, United States Code, Section 847, in that he stored high explosives, including
22 triacetone triperoxide (TATP) and picric acid, in a detached workshop in close proximity
23 to his residence, said workshop not then confirming with the requirements of Type 1
24 storage facilities.

25 All in violation of Title 18, United States Code, Sections 842(j) and 844(b), and
26 Title 27, Code of Federal Regulations, Section 555.201, *et. seq.*

FORFEITURE ALLEGATION

The allegations contained in Counts 1 – 6 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1, JAMES WESLEY BOWDEN shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and associated ammunition that were involved in the offense. These include but are not limited to:

- a. one DPMS Inc. Model A-15 5.56mm rifle, bearing serial number FH28458, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;
 - b. one Savage Model 110 .270 Winchester caliber rifle bearing serial number F255255, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;
 - c. one Ceska Zbrojovka (CZ) Model CZ 75 Tactical Sporter Orange .40 S&W caliber pistol bearing serial number D225312, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;
 - d. one Smith & Wesson Model M&P 15 .458 SOCOM caliber rifle bearing serial number SZ56510, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;
 - e. one Colt Model Single Action Army .45 Colt caliber revolver bearing serial number SA98998, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;
 - f. one Colt Model Detective Special .38 Special caliber revolver bearing serial number C08216, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;

- 1 g. one Czech Small Arms Model SA VZ61 .32 ACP caliber pistol bearing serial
2 number 6102772, and any associated ammunition, seized from the Defendant
3 in Arlington, Washington on November 4, 2021;
- 4 h. one Izhevsk Mechanical Plant Model IZH 35 .22LR caliber pistol bearing
5 serial number M216600B, and any associated ammunition, seized from the
6 Defendant in Arlington, Washington on November 4, 2021; and,
- 7 i. one Jimenez Arms Model JA 380 .380ACP pistol bearing serial number 291731, and
8 any associated ammunition, seized from the Defendant in Arlington, Washington
9 on November 4, 2021.

10 Upon conviction of the offense alleged in Count 2, JAMES WESLEY BOWDEN
11 shall forfeit to the United States, pursuant to Title 18, United States Code, Section
12 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any machineguns and
13 associated ammunition that were involved in the offense. These include but are not
14 limited to:

- 15 a. one .308 Winchester caliber machinegun assembled using a receiver from an
16 Imbel FZ Model FZ DA rifle bearing serial number IB1856, and any
17 associated ammunition, seized from the Defendant in Arlington, Washington
18 on November 4, 2021; and,
- 19 b. one .300 Blackout caliber privately manufactured firearm utilizing a
20 machinegun revolver of unknown origin, and any associated ammunition,
21 seized from the Defendant in Arlington, Washington on November 4, 2021.

22 Upon conviction of the offense alleged in Count 3, JAMES WESLEY BOWDEN
23 shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872,
24 any short barreled rifle and associated ammunition involved in the offense. These include
25 but are not limited to:

- 26 a. one 9x19 mm caliber privately made rifle with no serial number, and any
27 associated ammunition, seized from the Defendant in Arlington, Washington
28 on November 4, 2021.

1 Upon conviction of the offense alleged in Count 4, JAMES WESLEY BOWDEN
2 shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872,
3 any destructive devices involved in the offense. These include but are not limited to:

- 4 a. one grenade seized from the Defendant in Arlington, Washington on
5 November 4, 2021.

6 Upon conviction of the offense alleged in Count 5, JAMES WESLEY BOWDEN
7 shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872,
8 any silencers involved in the offense. These include but are not limited to:

- 9 a. two black cylindrical firearms silencers with no identifying markings, seized
10 from the Defendant in Arlington, Washington on November 4, 2021.

11 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
12 any act or omission of the defendant,

- 13 a. cannot be located upon the exercise of due diligence;
14 b. has been transferred or sold to, or deposited with, a third party;
15 c. has been placed beyond the jurisdiction of the Court;
16 d. has been substantially diminished in value; or,
17 e. has been commingled with other property which cannot be divided
18 without difficulty,

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to
3 Title 21, United States Code, Section 853(p).

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5 A TRUE BILL:

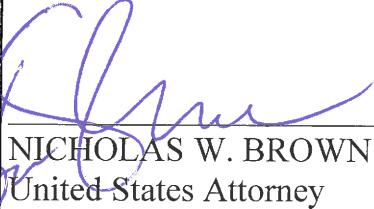
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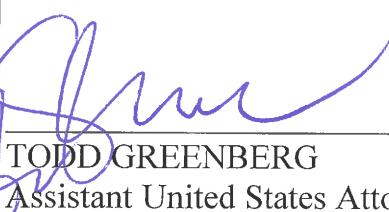
7 DATED: *15 December 2015*

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9 *Signature of Foreperson redacted pursuant*
10 *to the policy of the Judicial Conference of*
11 *the United States.*

12 _____
13 FOREPERSON
14

15 
16 NICHOLAS W. BROWN
17 United States Attorney

18 
19 TODD GREENBERG
20 Assistant United States Attorney

21 
22 CECELIA GREGSON
23 Assistant United States Attorney